

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

Case No.: 1:21-cv-00398

Plaintiff,

v.

PAOLO PROVENZI  
IKONICK COLLECTION LTD.  
MOHAMMED ALSALOUSSI

Defendants.

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**DEFENDANT IKONICK COLLECTION LTD.'S NOTICE OF MOTION TO VACATE  
THE DEFAULT JUDGMENT ENTERED AGAINST IT**

PLEASE TAKE NOTICE that Defendant Ikonick Collection LTD (“Ikonick”), by and through its attorneys, hereby moves, pursuant to Fed. R. Civ. P. 60, for an Order vacating the default judgment entered by the Honorable Jeremiah J. McCarthy on June 17, 2024. In support of this Motion, Ikonick relies on the accompanying Memorandum of Law, filed simultaneously herewith.

Pursuant to Local Rule 7(a)(1), Ikonick intends to file a Reply Memorandum in further support of its motion.

Dated: July 31, 2024

**LIPPES MATHIAS LLP**

s/ Brendan H. Little

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